

AO 91 (Rev. 11/11) Criminal Complaint

Agent:

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## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Martin ALVAREZ-Bedolla

Case No. Case: 2:24-mj-30149

Assigned To : Unassigned

Assign. Date : 4/22/2024

USA V. ALVAREZ-BEDOLLA (CMP)(CMC)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 17, 2024 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

## Code Section

## Offense Description

Title 8, United States Code, Section 1326(a), (b)(2)

Unlawful Re-entry Following Removal from the United States, Prior Aggravated Felony Offense Conviction

This criminal complaint is based on these facts:

On or about April 17, 2024, in the Eastern District of Michigan, Southern Division, Martin ALVAREZ-Bedolla, an alien from Mexico, who had previously been convicted of an aggravated felony offense, was found in the United States after having been denied admission, excluded, deported, and removed therefrom on or about November 2, 2015, at or near Del Rio, Texas, and not having obtained the express consent of the Attorney General of the United States or the Secretary of Homeland Security to re-apply for admission thereto; in violation of Title 8, United States Code, Section 1326 (a), (b)(2).


☒ Continued on the attached sheet.


Complainant's signature

Brett Laug, U.S. Border Patrol Agent, DHS

Printed name and title

Sworn to before me and signed in my presence.

Date: April 22, 2024City and state: Detroit, Michigan


Judge's signature

Kimberly Altman, United States Magistrate Judge

Printed name and title

**AFFIDAVIT**

I, Brett A. Laug, declare the following under penalty of perjury:

1. I am a Border Patrol Agent with the United States Department of Homeland Security, United States Border Patrol. The facts set forth herein are based upon my personal knowledge as well as information provided by other law enforcement officers to include Border Patrol Agents and record checks of law enforcement databases. I have also reviewed the immigration file and system automated data relating to Martin ALVAREZ- Bedolla, which attests to the following:
2. ALVAREZ- Bedolla is a 55-year-old male, native and citizen of Mexico, who last entered the United States at an unknown place, on an unknown date without being admitted, inspected or paroled by an Immigration Officer.
3. On April 12, 2004, ALVAREZ- Bedolla was arrested by Greenwood County Sheriff's Office in South Carolina and was charged with Public Disorderly Conduct. He was convicted and fined.
4. On October 1, 2008, ALVAREZ- Bedolla was convicted for Conspiracy to Distribute 5 Kilograms or More Cocaine Hydrochloride. ALVAREZ- Bedolla was sentenced to 135 months in custody, 5 years supervised release and a \$100 assessment.
5. On November 2, 2015, ALVAREZ- Bedolla's sentence was reduced to 120 months custody after appeal.
6. On April 1, 2015, ALVAREZ- Bedolla was encountered by Immigration and Customs Enforcement (ERO) pursuant to the Criminal Alien Program while incarcerated within the Airpark Unit in Big Spring, Texas. ALVAREZ- Bedolla, was ordered removed from the United States by an Immigration Judge on September 16, 2015, and was removed to Mexico on November 2, 2015, through Del Rio, Texas.
7. On April 17, 2024, Border Patrol Agents were patrolling Interstate (I)-75 south of Detroit, Michigan in a joint operation (Dance Fever) with the Michigan State Police (MSP). The joint operation objective is to target and interdict human and narcotics traffickers in the southeastern portion of Michigan. At approximately 3:00 P.M. MSP units observed a gold Chevrolet Malibu bearing New York license plate KAG 5899 travelling northbound on

I-75 south of mile marker 37 near the city of Taylor, Michigan. MSP Trooper Smith notified units in the area via service radio that he observed a traffic violation for improper lane use and was going to perform a vehicle stop on the gold Malibu. ALVAREZ- Bedolla was encountered inside of the vehicle with four additional persons, two of which were found to be illegally present in the United States.

8. ALVAREZ- Bedolla's fingerprints and photograph were captured and entered into Biometric systems. The results revealed that ALVAREZ- Bedolla is a citizen of Mexico who has been previously removed from the United States as an Aggravated Felon. The record checks did not provide any evidence that ALVAREZ- Bedolla legally entered the United States or had been issued any legal immigration document allowing him to enter or remain in the United States.
9. The aforementioned arrest and subsequent detention was an administrative, non-criminal action made pursuant to the authority found in sections 1357, 1225, 1226, and/or 1231 of Title 8, United States Code to arrest and detain any alien entering or attempting to enter the United States, or any alien present in the United States, who is reasonably believed to be in violation of any law or regulation regulating the admission, exclusion, expulsion, or removal of aliens.
10. Review of the Alien File (A# XXX XXX 216) for Martin ALVAREZ- Bedolla and queries in U.S. Border Patrol computer databases confirm no record exists of him obtaining permission from the Attorney General or the Secretary of the Department of Homeland Security to re-apply for admission to the United States after his removal from the United States on November 2, 2015.

11. Based on the above information, I believe there is probable cause to conclude that Martin ALVAREZ-Bedolla is an alien, who was previously convicted of an aggravated felony offense and who was found in the United States after removal, without the express permission from the Attorney General of the United States or from the Secretary of the Department of Homeland Security to re-apply for admission into the United States in violation of Title 8, United States Code, Section 1326(a), (b)(2).



Brett A. Laug, Border Patrol Agent  
U.S. Department of Homeland Security

Sworn to before me and signed in my  
presence and/or by reliable electronic means.



Honorable Kimberly Altman  
United States Magistrate Judge

Dated: April 22, 2024